

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

Retail Access Optimization Initiative

Docket No. N2011-1

**National Association of Postmasters of the United States
Second Interrogatories and Requests for Production of Documents to U.S. Postal
Service Witness James Boldt
(NAPUS/USPS-T-1-23-41)
(August 12, 2011)**

Pursuant to Rules 25 through 28 Rules of Practice, the National Association of Postmasters of the United States (NAPUS) directs the following interrogatories to United States Postal Service witness James Boldt (USPS-T-1). Definitions and instructions included with the Association's interrogatories NAPUS/USPS-1-22 dated August 8, 2011, are hereby incorporated by reference.

Respectfully submitted,

/s/

Robert M. Levi
Director of Government Relations
National Association of Postmasters of the United States
8 Herbert Street
Alexandria, VA 22305
blevi@napus.org

NAPUS/USPS-T-1-23

Please refer to USPS-T-1, page 14. You state in your testimony that the Retail Access Optimization initiative will “examine the feasibility of discontinuing operations at Post Offices, stations and branches within the retail network.” Moreover, you state: “Approximately, 3,650 candidate facilities will be examined.” Please confirm that the RAO examination has already started. When will the first examined post offices be posted for proposed closures? Please explain why the Postal Service commenced the RAO initiative prior to receiving the required advisory opinion.

NAPUS/USPS-T-1-24

Please explain the different contracting and regulatory authorities under which the Postal Service may enter into an agreement with a Contract Postal Unit (CPU), in contrast to a Village Post Office?

NAPUS/USPS-T-1-25

Please refer to POIR-1, question 12.

- Please differentiate the “bidding process” for a CPU, as compared to the bidding process for a VPO?
- Please explain who would be responsible for identifying and soliciting potential VPO contractors, and how does this differ from identifying and soliciting potential CPU vendors?

NAPUS/USPS-T-1-26

Please confirm that a CPU shares postal revenue, while a VPO would receives a flat-rate payment. Is there an established payment for a VPO? If so, what is the payment? If not, how is that amount determined, and who determines the payment?

NAPUS/USPS-T-1-27

Please explain the distinctions in administration and oversight of a post office, station/branch, CPU and VPO. Please include the customer complaint process and complaint resolution process for each type of facility.

NAPUS/USPS-T-1-28

Are there any restrictions on what types of commercial enterprises may be designated a VPO? If so, please explain.

NAPUS/USPS-T-1-29

Will VPOs accept or distribute letter mail or parcels? If so, what training will the acceptance and distribution personnel receive, and who will train?

NAPUS/USPS-T-1-30

Will a VPO be required to provide space for post office boxes? If not, where would the post office boxes be located and how would they be secured?

NAPUS/USPS-T-1-31

At the conclusion of a VPO contract, or if a VPO contract is terminated, how will the USPS assure continuation of service to the impacted community?

NAPUS/USPS-T-1-32

Please refer to USPS-T-1, page 6, Table 6 and page 7, Table 2. Does the data in Table 2 apply solely to communities served by the POS locations referenced in Table 1. If not, please apply the data to the POS locations.

NAPUS/USPS-T-1-33

Within the communities served by the 2,800 candidate post offices, please indicate the percentage of postal customers who used alternative venues for postal transactions for the most recent five years, if available.

NAPUS/USPS-T-1-34

Please refer to USPS-T-1, page 18, lines 2 through 8.

- Please explain the process for filling a vacant Postmaster position, and enumerate the circumstances under which a Postmaster vacancy would not be filled.
- Please identify the post offices that are currently suspended for which there is a Postmaster vacancy.
- Is a post office considered vacant if an officer-in-charge is managing the facility?
- Please indicate the specific criteria and threshold for concluding that there is “insufficient customer demand.”
- Please indicate the specific criteria and threshold for concluding that there is available “alternative access channels.”
- Please indicate who determines that there exists “alternative access channels.”

NAPUS/USPS-T-1-35

Please compare the parameters of the initial feasibility study conducted pursuant to the RAO, and compare with the pre-proposal study conducted in conformance to *Handbook PO-101*, section 22.

NAPUS/USPS-T-1-36

Please refer to USPS-T-1, page 19, footnote 17. You state that a community meeting is required at either the initial feasibility study stage, or at the post-proposal stage.

- Please confirm that only one meeting would occur on a specific candidate facility, and that meeting would cover both stages.
- Please indicate the duration or timeline of the “initial feasibility stage.”
- If there is no time limit, is there a requirement for community meetings at particular increments (e.g., annually) for a candidate post office?

NAPUS/USPS-T-1-37

Please refer to *Handbook PO-101*, section 25 (Community Meeting) and reference the previous question. Is a separate community meeting required for each candidate post office within the initial feasibility stage and/or the post proposal stage, or would the USPS conduct joint meetings to cover multiple facilities?

NAPUS/USPS-T-1-38

Please refer to *Handbook PO-101*. Please explain the distinction between the communications with customers and stakeholders that are initiated pursuant to the pre-proposal investigation, as compared to the communications that take place at the proposal stage.

NAPUS/USPS-T-1-39

Please refer to *Handbook PO-101*, section 321.1 and 321.2. Please explain the distinction between the items evaluated in each of the two sections.

NAPUS/USPS-T-1-40

Please refer to *Handbook PO-101*, section 321.2.

- Please explain how the USPS evaluates the importance of a post office, as the sole representative of the government, to a community
- Please explain how the USPS evaluates the importance of a post office as the focal point of the community
- Please explain how the USPS evaluates the economic impact that the presence of a post office has on the community
- Please explain how the USPS evaluates the social impact, including communal cohesion, that the presence of a post office has on a community
- Please explain how the USPS evaluates the presence of a post office to vulnerable populations, such as senior citizens and mobility impaired citizens
- Please explain how the USPS evaluates the degree to which a community utilizes broadband digital communications

NAPUS/USPS-T-1-41

Please refer to POIR 1, question 8. Who would make the assessment of the ability of remaining postal facilities to absorb the increased retail traffic resulting from the discontinuance of a facility?